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January 12, 2022

VIA ECF

Hon. Gregory H. Woods
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007

Re: *T.H. v. N.Y.C. Dep't of Educ.*, 21-cv-7104 (GHW)(RWL)

Dear Judge Woods:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, Georgia M. Pestana, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorney's fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. § 1400, *et seq.* ("IDEA"), as well as for this action.

I write to respectfully request that the conference scheduled for January 19, 2022 be adjourned *sine die*, and the corollary pre-conference submission due today also be adjourned *sine die*. Plaintiff consents to this request. We apologize for the lateness of this request, which arises to due administrative difficulties attending the assignment process in my office with respect to this case, and for the inconvenience for the Court. Defendant also requests that Defendant's time to answer the complaint be extended *nunc pro tunc* to February 7, 2022. Plaintiff also graciously consented to this request. This is the second request for an extension. The first request was made on October 22, 2021 and granted by Your Honor on October 25, 2021.

We note that Defendant will make every effort to expedite the resolution of this case—once Plaintiff provides the relevant attorney billing records. The requested extension will permit Defendant to receive and review records together with the administrative hearing record, and

complete our internal process and present a fair offer of settlement. We are hopeful that this case can be settled without further burden on the Court's time. We propose that the parties submit a status letter by February 7, 2022, either informing the Court that the case has been fully resolved, or, proposing a briefing schedule.

Accordingly, the undersigned requests that its time to answer the complaint be extended *nunc pro tunc* to February 7, 2022, and that the January 19, 2022 conference be adjourned *sine die*, and that a joint status letter be due no later than February 7, 2022.

Thank you for considering these requests.

Respectfully submitted,

/s/

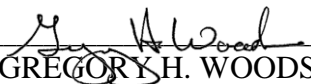
Martha Nimmer, Esq.
Special Assistant Corporation Counsel

cc: Justin Coretti, Esq. (via ECF)

Defendant's request is granted. The deadline for Defendant to answer or otherwise respond to Plaintiff's complaint is extended to February 7, 2022. The parties shall submit a joint status letter no later than February 7, 2022 informing the Court of, among other things, that status of their efforts to resolve this dispute. The initial pre-trial conference currently scheduled for January 19, 2022 is adjourned *sine die*.

SO ORDERED.

Dated: January 12, 2022
New York, New York


GREGORY H. WOODS
United States District Judge